

EXHIBIT A

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Attorneys for Plaintiff

**EIGHTH JUDICIAL DISTRICT COURT
DISTRICT OF NEVADA**

BRIAN A. WALSH,
Plaintiff,
v.

**BANK OF AMERICA, N.A.,
CAPITAL ONE, COMPASS
BANK, MORTGAGE SERVICE
CENTER, SPECIALIZED LOAN
SERVICING, LLC,
ROUNDPOINT MORTGAGE,
and EXPERIAN
INFORMATION SOLUTIONS,
INC.,**

Defendants.

Case No.: A-15-722747-C

Dept.: X

SUMMONS - CIVIL

SUMMONS

1
2 **NOTICE! YOU HAVE SUED. THE COURT MAY DECIDE AGAINST YOU**
3 **WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20**
4 **DAYS. READ THE INFORMATION BELOW:**

5
6 **TO THE DEFENDANT(S):**


7
8 **CAPITAL ONE BANK USA, N.A.**
9 4851 Cox Road
Glen Allen, VA 23060


10 A civil Complaint has been filed by the Plaintiff(s) against you for the relief set
11 forth in the Complaint.

- 12
13 1. If you intend to defend this lawsuit, within 20 days after this Summons is
14 served on you, exclusive of the day of service, you must do the following:
15 a. File with the Clerk of this Court, whose address is shown below, a
16 formal written response to the Complaint in accordance with the rules
17 of the Court, with the appropriate filing fee.
18 b. Serve a copy of your response upon the attorney whose name and
19 address is shown below.

20 Submitted by,

STEVEN D. GRIERSON
CLERK OF COURT

21 BY: 
22 DANNY J. HOREN, ESQ.
23 KAZEROUNI LAW GROUP
24 7854 W. SAHARA AVENUE
LAS VEGAS, NV 89117
ATTORNEY FOR PLAINTIFF

25
26
27
28
BY:  NOV 12 2015
DEPUTY CLERK DATE
REGIONAL JUSTICE CENTER
200 LEWIS AVENUE
LAS VEGAS, NV 89155
JANEL WASHINGTON

SUMMONS

DISTRICT COURT CIVIL COVER SHEET

A- 15- 722747- C

Clark

County, Nevada

Case No. _____

X

(Assigned by Clerk's Office)

I. Party Information (provide both home and mailing addresses if different)

Plaintiff(s) (name/address/phone):

Brian A. Walsh

Defendant(s) (name/address/phone):

Bank of America, N.A., Capital One,
Compass Bank, Mortgage Service Center
Specialized Loan Servicing, LLC,
Roundpoint Mortgage, et al.

Attorney (name/address/phone):

Danny Horen

7854 W. Sahara Avenue

Las Vegas, NV 89117

Attorney (name/address/phone):

II. Nature of Controversy (please select the one most applicable filing type below)**Civil Case Filing Types**

Real Property Landlord/Tenant <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant Title to Property <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property Other Real Property <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property		Negligence <input type="checkbox"/> Auto <input type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence Malpractice <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice	Torts Other Torts <input type="checkbox"/> Product Liability <input type="checkbox"/> Intentional Misconduct <input type="checkbox"/> Employment Tort <input type="checkbox"/> Insurance Tort <input type="checkbox"/> Other Tort
Probate Probate (select case type and estate value) <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside <input type="checkbox"/> Trust/Conservatorship <input type="checkbox"/> Other Probate Estate Value <input type="checkbox"/> Over \$200,000 <input type="checkbox"/> Between \$100,000 and \$200,000 <input type="checkbox"/> Under \$100,000 or Unknown <input type="checkbox"/> Under \$2,500	Construction Defect & Contract Construction Defect <input type="checkbox"/> Chapter 40 <input type="checkbox"/> Other Construction Defect Contract Case <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Building and Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Collection of Accounts <input type="checkbox"/> Employment Contract <input type="checkbox"/> Other Contract	Judicial Review/Appeal Judicial Review <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Petition to Seal Records <input type="checkbox"/> Mental Competency Nevada State Agency Appeal <input type="checkbox"/> Department of Motor Vehicle <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency Appeal Other <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review/Appeal	
Civil Writ Civil Writ <input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrant <input type="checkbox"/> Writ of Prohibition <input type="checkbox"/> Other Civil Writ		Other Civil Filing Other Civil Filing <input type="checkbox"/> Compromise of Minor's Claim <input type="checkbox"/> Foreign Judgment <input checked="" type="checkbox"/> Other Civil Matters	

Business Court filings should be filed using the Business Court civil coversheet.

8/6/2015

Date

/s/ Danny Horen

Signature of initiating party or representative

See other side for family-related case filings.


CLERK OF THE COURT

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Attorneys for Plaintiff

EIGHTH JUDICIAL DISTRICT COURT

DISTRICT OF NEVADA

BRIAN A. WALSH,

Plaintiff,

v.

**BANK OF AMERICA, N.A.,
CAPITAL ONE, COMPASS
BANK, MORTGAGE SERVICE
CENTER, SPECIALIZED LOAN
SERVICING, LLC,
ROUNDPOINT MORTGAGE,
and EXPERIAN
INFORMATION SOLUTIONS,
INC.,**

Defendants.

Case No.: A- 15 - 722747 - C

X
**COMPLAINT FOR DAMAGES
PURSUANT TO THE FAIR CREDIT
REPORTING ACT, 15 U.S.C. § 1681,
ET SEQ.**

JURY TRIAL DEMANDED

COMPLAINT

INTRODUCTION

1
2 1. The United States Congress has found the banking system is dependent upon
3 fair and accurate credit reporting. Inaccurate credit reports directly impair
4 the efficiency of the banking system, and unfair credit reporting methods
5 undermine the public confidence, which is essential to the continued
6 functioning of the banking system. Congress enacted the Fair Credit
7 Reporting Act, 15 U.S.C. § 1681 *et seq.* ("FCRA"), to insure fair and
8 accurate reporting, promote efficiency in the banking system, and protect
9 consumer privacy. The FCRA seeks to ensure consumer reporting agencies
10 exercise their grave responsibilities with fairness, impartiality, and a respect
11 for the consumer's right to privacy because consumer reporting agencies
12 have assumed such a vital role in assembling and evaluating consumer credit
13 and other information on consumers. The FCRA also imposes duties on the
14 sources that provide credit information to credit reporting agencies, called
15 "furnishers."
16

17 2. BRIAN A. WALSH ("Plaintiff"), by Plaintiff's attorneys, brings this action
18 to challenge the actions of Defendants BANK OF AMERICA, N.A., ("B of
19 A"), CAPITAL ONE ("Capital One"), COMPASS BANK ("Compass"),
20 MORTGAGE SERVICE CENTER ("MSC"), SPECIALIZED LOAN
21 SERVICING, LLC ("SLS"), ROUNDPOINT MORTGAGE
22 ("Roundpoint") and EXPERIAN INFORMATION SOLUTIONS, INC.
23
24
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1 (“Experian”) (or jointly as “Defendants”) with regard to erroneous reports
2 of derogatory and negative credit information made by Defendants to
3 national reporting agencies, and for failure of Defendants to properly
4 investigate, and this conduct caused Plaintiff damages.
5

6 3. Plaintiff makes these allegations on information and belief, with the
7 exception of those allegations that pertain to Plaintiff, or to Plaintiff’s
8 counsel, which Plaintiff alleges on personal knowledge.
9

10 4. While many violations are described below with specificity, this Complaint
11 alleges violations of the statute cited in its entirety.
12

13 5. Unless otherwise stated, all the conduct engaged in by Defendants took
14 place in Nevada.
15

16 6. Any violations by Defendants were knowing, willful, and intentional, and
17 Defendant did not maintain procedures reasonably adapted to avoid any such
18 violation.
19

20 7. Unless otherwise indicated, the use of Defendants’ name in this Complaint
21 includes all agents, employees, officers, members, directors, heirs,
22 successors, assigns, principals, trustees, sureties, subrogees, representatives,
23 and insurers of Defendants’ named.
24

25 JURISDICTION AND VENUE

26 8. This action arises out of Defendants’ violations of the Fair Credit Reporting
27 Act, 15 U.S.C. §§ 1681-1681(x) (“FCRA”).
28

1 9. Venue is proper in this Court because Defendants are subject to personal
2 jurisdiction in the County of Clark, State of Nevada as they conduct business
3 there, and the conduct giving rise to this action occurred in Nevada.
4

5 **PARTIES**

6 10. Plaintiff is a natural person residing in the County of Clark, State of Nevada.

7 In addition, Plaintiff is a “consumer” as that term is defined by 15 U.S.C. §
8 1681a(c). Defendant B of A is a corporation doing business in the State of
9 Nevada. Defendant Capital One is a corporation doing business in the State
10 of Nevada. Defendant Compass is a corporation doing business in the State
11 of Nevada. Defendant MSC is a corporation doing business in the State of
12 Nevada. Defendant SLS is a corporation doing business in the State of
13 Nevada. Defendant Roundpoint is a corporation doing business in the State
14 of Nevada. Defendant Experian is a corporation doing business in the State
15 of Nevada.
16
17
18

19 11. Defendants B of A, Capital One, Compass, MSC, SLS, and Roundpoint are
20 furnishers of information as contemplated by 15 U.S.C. § 1681s-2(b) that
21 regularly and in the ordinary course of business furnish information to a
22 consumer credit reporting agency.
23

24 12. Defendant Experian is a national credit reporting agency, doing business in
25 Nevada, with a principal place of business in Ohio.
26
27
28

GENERAL ALLEGATIONS

13. At all times relevant, Plaintiff was an individual residing within the State of Nevada.

14. At all times relevant, Defendants conducted business in the State of Nevada.

15. On or about April 30, 2010, Plaintiff filed for Bankruptcy in the United States Bankruptcy Court for the District of Nevada. Plaintiff's case was assigned Case Number 10-17987 (the "Bankruptcy").

16. The obligations ("Debt") to each defendant were scheduled in the Bankruptcy and Defendants, the Creditors, received notice of the Bankruptcy.

17. On or about August 26, 2014, Plaintiff received a Bankruptcy discharge.

18. None of the Defendants filed any proceedings to declare their Debt "non dischargeable" pursuant to 11 U.S.C. § 523 *et seq.*

19. Defendants also did not request relief from the "automatic stay" codified at 11 U.S.C. §362 *et seq.* while the Plaintiff's Bankruptcy was pending to pursue the Plaintiff on any *personal* liability for any of the underlying Debts.

20. Accordingly, the Debt to each defendant was discharged through the Bankruptcy.

21. Further, while the automatic stay was in effect during the Bankruptcy, it was illegal for any of the Defendants to report any post-Bankruptcy derogatory collection information.

1 22. Defendants' reporting post-Bankruptcy derogatory information was
2 inaccurate and misleading in that Defendants continued reporting
3 information based on Defendants' pre-bankruptcy contract terms with the
4 Plaintiff, which were no longer enforceable upon the bankruptcy filing,
5 thereby rendering the disputed information "inaccurate."

7 23. Additionally, Defendants' inaccurate reporting did not comply with the
8 Consumer Data Industry Association's Metro 2 reporting standards, which
9 provides guidance for credit reporting and FCRA compliance.

11 24. Plaintiff subsequently learned that each of the named Defendants reported
12 post-Bankruptcy derogatory credit information regarding the obligations on
13 Plaintiff's credit reports, thereby causing erroneous and negative credit
14 information in Plaintiff's credit files.
15

16
17 **Bank of America, N.A. Misreported Credit Information**

18 **Re: Account No. 6818011776***

19 25. In an Experian credit report dated February 11, 2015, B of A reported the
20 following inaccurate, derogatory information:
21

- 22 • Post-bankruptcy information for the following dates: August 2010
23 (90 days past due) and September 2010 (CO—Charge Off)
24

25 26. B of A should not have reported derogatory information on Plaintiff's
26 account after April 30, 2010, because Plaintiff filed for Bankruptcy on April
27 30, 2010.
28

1 27. The adverse information reported by Defendant complained of herein was
2 based on Defendant's assertion of pre-bankruptcy obligations and was
3 therefore inaccurate, since after filing Chapter 13 Bankruptcy the Chapter 13
4 plan determined how Defendant would be paid. Failing to report consistent
5 with the terms of the Chapter 13 plan was therefore inaccurate.
6

7 28. Defendant failed to report consistent with the terms of the Plaintiff's Chapter
8 13 Plan and thereby furnished inaccurate information as set forth herein.
9

10 29. On or about March 18, 2015, Plaintiff disputed B of A's reported
11 information regarding the Debt pursuant to 15 U.S.C. § 1681I(a)(2) by
12 notifying Experian, in writing, of the incorrect and inaccurate credit
13 information furnished by B of A.
14

15 30. Specifically, Plaintiff sent a letter, certified, return receipt, to Experian (the
16 "Experian Dispute Letter"), requesting the above inaccurate and incorrect
17 derogatory information be removed as follows:
18

- 19
- 20 • This account was discharged in my Bankruptcy which was filed on
21 4/30/2010 and discharged 8/26/2014, bearing docket No. 10-17987 in
22 the District for Nevada. There should be no derogatory reporting after
23 the filing date. Specifically, please remove the derogatory information
24 for the following post-bankruptcy dates: Aug2010 (90days past due)
25 and Sep2010 (CO – Charge Off).

26 31. The Experian Dispute Letter further requested that Experian:
27

- 28 • Immediately delete this account and the disputed derogatory
information from [Plaintiff's] credit report.

1 • The discharged debt should be reported with an account balance
2 of \$0 with a status of “current”.

3 • Further, there should be no post-bankruptcy activity reported on
4 this account. The date of last activity on this account should pre-
5 date my bankruptcy filing date, 4/30/2010, since a default on this
6 account occurred no later than the Bankruptcy filing date.

7 • Any post-bankruptcy derogatory information should be
8 immediately deleted from [Plaintiff’s] report.

9 • If [Experian] do[es] not immediately delete this from
10 [Plaintiff’s] credit report, please include a 100-word statement in
11 my credit report of all of the disputed information contained in this
12 letter regarding this account.

13 32. Upon information and belief, Experian timely notified B of A of Plaintiff’s
14 dispute, but B of A continued reporting derogatory information.

15 33. B of A and Experian were required to conduct a reinvestigation into this
16 specific account on Plaintiff’s consumer report pursuant to 15 U.S.C.
17 §1681i.

18 34. On or about April 13, 2015, Plaintiff received notification from Experian
19 that B of A and Experian received notice of Plaintiff’s dispute pursuant to 15
20 U.S.C. § 1681i(a)(6), and verified the account “may be considered negative.”

21 35. Surprisingly, rather than remove all the inaccurate, derogatory information
22 from Plaintiff’s report, B of A and Experian simply left derogatory
23 information on Plaintiff’s report. Specifically, B of A and Experian reported
24 the following inaccurate, derogatory information:
25
26
27
28

- Post-bankruptcy information for the following dates: August 2010 (90 days past due) and September 2010 (CO—Charge Off)

36. B of A and Experian, upon receipt of Plaintiff's dispute, failed to conduct an investigation with respect to the disputed information as required by 15 U.S.C. § 1681s-2(b)(1)(A).

37. B of A and Experian failed to review all relevant information provided by Plaintiff in the dispute to Experian, as required by and in violation of 15 U.S.C. § 1681s-2(b)(1)(B).

38. Due to B of A and Experian's failure to investigate, they each further failed to correct and update Plaintiff's information as required by 15 U.S.C. § 1681s-2(b)(1)(E), thereby causing continued reporting of inaccurate information in violation of 15 U.S.C. § 1681-s(2)(b)(1)(C).

39. Plaintiff's continued efforts to correct B of A and Experian's erroneous and negative reporting of the Debt by communicating Plaintiff's dispute with B of A and Experian were fruitless.

40. B of A and Experian's continued inaccurate and negative reporting of the Debt in light of its knowledge of the actual error was willful.

41. B of A and Experian's inaccurate and negative reporting damaged Plaintiff's creditworthiness.

42. By inaccurately reporting account information relating to the Debt after notice and confirmation of its errors, B of A and Experian failed to take the

appropriate measures as determined in 15 U.S.C. §§ 1681-s(2)(b)(1)(D) and (E).

Capital One Bank USA, N.A. Misreported Credit Information

Re: Account No. 430572152375*

43. In an Experian credit report dated February 11, 2015, Capital One reported the following inaccurate, derogatory information:

- Balances from February 2013 through April 2013 in the Account History Section

44. Capital One should not have reported derogatory information on Plaintiff's account after April 30, 2010, because Plaintiff filed for Bankruptcy on April 30, 2010.

45. The adverse information reported by Defendant complained of herein was based on Defendant's assertion of pre-bankruptcy obligations and was therefore inaccurate, since after filing Chapter 13 Bankruptcy the Chapter 13 plan determined how Defendant would be paid. Failing to report consistent with the terms of the Chapter 13 plan was therefore inaccurate.

46. Defendant failed to report consistent with the terms of the Plaintiff's Chapter 13 Plan and thereby furnished inaccurate information as set forth herein.

47. On or about March 18, 2015, Plaintiff disputed Capital One's reported information regarding the Debt pursuant to 15 U.S.C. § 1681i(a)(2) by

1 notifying Experian, in writing, of the incorrect and inaccurate credit
2 information furnished by Capital One.

3 48. Specifically, Plaintiff sent a letter, certified, return receipt, to Experian (the
4 “Experian Dispute Letter”), requesting the above inaccurate and incorrect
5 derogatory information be removed as follows:
6

- 7
- 8 • This account was discharged in my Bankruptcy which was filed on
9 4/30/2010 and discharged 8/26/2014, bearing docket No. 10-17987 in
10 the District for Nevada. The balance on this account should be “\$0”
11 and the status should be reporting as “current”. Specifically, you show
12 in the Account history Account Balances from Feb13 – Apr13.

13 49. The Experian Dispute Letter further requested that Experian:

- 14
- 15 • Immediately delete this account and the disputed derogatory
16 information from [Plaintiff’s] credit report.
 - 17 • The discharged debt should be reported with an account balance
18 of \$0 with a status of “current”.
 - 19 • Further, there should be no post-bankruptcy activity reported on
20 this account. The date of last activity on this account should pre-
21 date my bankruptcy filing date, 4/30/2010, since a default on this
22 account occurred no later than the Bankruptcy filing date.
 - 23 • Any post-bankruptcy derogatory information should be
24 immediately deleted from [Plaintiff’s] report.
 - 25 • If [Experian] do[es] not immediately delete this from
26 [Plaintiff’s] credit report, please include a 100-word statement in
27 my credit report of all of the disputed information contained in this
28 letter regarding this account.

1 50. Upon information and belief, Experian timely notified Capital One of
2 Plaintiff's dispute, but Capital One continued reporting derogatory
3 information.
4

5 51. Capital One and Experian were required to conduct a reinvestigation into
6 this specific account on Plaintiff's consumer report pursuant to 15 U.S.C.
7 §1681i.
8

9 52. On or about April 13, 2015, Plaintiff received notification from Experian
10 that Capital One and Experian received notice of Plaintiff's dispute pursuant
11 to 15 U.S.C. § 1681i(a)(6), and verified the account "may be considered
12 negative."
13

14 53. Surprisingly, rather than remove all the inaccurate, derogatory information
15 from Plaintiff's report, Capital One and Experian simply left derogatory
16 information on Plaintiff's report. Specifically, Capital One and Experian
17 reported the following inaccurate, derogatory information:
18

- 19
- 20 • Balance in April 2013 in the Account History Section

21 54. Capital One and Experian, upon receipt of Plaintiff's dispute, failed to
22 conduct an investigation with respect to the disputed information as required
23 by 15 U.S.C. § 1681s-2(b)(1)(A).
24

25 55. Capital One and Experian failed to review all relevant information provided
26 by Plaintiff in the dispute to Experian, as required by and in violation of 15
27 U.S.C. § 1681s-2(b)(1)(B).
28

1 56. Due to Capital One and Experian's failure to investigate, they each further
2 failed to correct and update Plaintiff's information as required by 15 U.S.C.
3 § 1681s-2(b)(1)(E), thereby causing continued reporting of inaccurate
4 information in violation of 15 U.S.C. § 1681-s(2)(b)(1)(C).
5

6 57. Plaintiff's continued efforts to correct Capital One and Experian's erroneous
7 and negative reporting of the Debt by communicating Plaintiff's dispute
8 with Capital One and Experian were fruitless.
9

10 58. Capital One and Experian's continued inaccurate and negative reporting of
11 the Debt in light of its knowledge of the actual error was willful.
12

13 59. Capital One and Experian's inaccurate and negative reporting damaged
14 Plaintiff's creditworthiness.
15

16 60. By inaccurately reporting account information relating to the Debt after
17 notice and confirmation of its errors, Capital One and Experian failed to take
18 the appropriate measures as determined in 15 U.S.C. §§ 1681-s(2)(b)(1)(D)
19 and (E).
20

21 **Compass Bank Misreported Credit Information**

22 **Re: Account No. 5569***

23 61. In an Experian credit report dated February 11, 2015, Compass reported the
24 following inaccurate, derogatory information:
25

- 26 • Post-bankruptcy information for the following dates: February 2014
27 and March 2014 (30 days past due)
28

- Balances from February 2013 through February 2014 in the Account History Section

62. Compass should not have reported derogatory information on Plaintiff's account after April 30, 2010, because Plaintiff filed for Bankruptcy on April 30, 2010.

63. The adverse information reported by Defendant complained of herein was based on Defendant's assertion of pre-bankruptcy obligations and was therefore inaccurate, since after filing Chapter 13 Bankruptcy the Chapter 13 plan determined how Defendant would be paid. Failing to report consistent with the terms of the Chapter 13 plan was therefore inaccurate.

64. Defendant failed to report consistent with the terms of the Plaintiff's Chapter 13 Plan and thereby furnished inaccurate information as set forth herein.

65. On or about March 18, 2015, Plaintiff disputed Compass's reported information regarding the Debt pursuant to 15 U.S.C. § 1681I(a)(2) by notifying Experian, in writing, of the incorrect and inaccurate credit information furnished by Compass.

66. Specifically, Plaintiff sent a letter, certified, return receipt, to Experian (the "Experian Dispute Letter"), requesting the above inaccurate and incorrect derogatory information be removed as follows:

- This account was discharged in my Bankruptcy which was filed on 4/30/2010 and discharged 8/26/2014, bearing docket No. 10-17987 in the District for Nevada. There should be no derogatory reporting after the filing date. Specifically, please remove the derogatory information

1 for the following post-bankruptcy dates: Feb2014 and Mar2014 (30
2 days past due).

- 3 • This account was discharged in my Bankruptcy which was filed on
4 4/30/2010 and discharged 8/26/2014, bearing docket No. 10-17987 in
5 the District for Nevada. The balance on this account should be "\$0"
6 and the status should be reporting as "current". Specifically, in the
7 Account history you show Balances from Feb13 – Feb14.

8 67. The Experian Dispute Letter further requested that Experian:

- 9 • Immediately delete this account and the disputed derogatory
10 information from [Plaintiff's] credit report.
- 11 • The discharged debt should be reported with an account balance
12 of \$0 with a status of "current".
- 13 • Further, there should be no post-bankruptcy activity reported on
14 this account. The date of last activity on this account should pre-
15 date my bankruptcy filing date, 4/30/2010, since a default on this
16 account occurred no later than the Bankruptcy filing date.
- 17 • Any post-bankruptcy derogatory information should be
18 immediately deleted from [Plaintiff's] report.
- 19 • If [Experian] do[es] not immediately delete this from
20 [Plaintiff's] credit report, please include a 100-word statement in
21 my credit report of all of the disputed information contained in this
22 letter regarding this account.

23 68. Upon information and belief, Experian timely notified Compass of
24 Plaintiff's dispute, but Compass continued reporting derogatory information.

25 69. Compass and Experian were required to conduct a reinvestigation into this
26 specific account on Plaintiff's consumer report pursuant to 15 U.S.C.
27 §1681i.
28

1 70. On or about April 13, 2015, Plaintiff received notification from Experian
2 that Compass and Experian received notice of Plaintiff's dispute pursuant to
3 15 U.S.C. § 1681i(a)(6), and verified the account "may be considered
4 negative."
5

6 71. Surprisingly, rather than remove all the inaccurate, derogatory information
7 from Plaintiff's report, Compass and Experian simply left derogatory
8 information on Plaintiff's report. Specifically, Compass and Experian
9 reported the following inaccurate, derogatory information:
10

- 11 • Post-bankruptcy information for the following dates: February 2014
12 (30 days past due)
13
- 14 • Balances from April 2013 through February 2014 in the Account
15 History Section
16

17 72. Compass and Experian, upon receipt of Plaintiff's dispute, failed to conduct
18 an investigation with respect to the disputed information as required by 15
19 U.S.C. § 1681s-2(b)(1)(A).
20

21 73. Compass and Experian failed to review all relevant information provided by
22 Plaintiff in the dispute to Experian, as required by and in violation of 15
23 U.S.C. § 1681s-2(b)(1)(B).
24

25 74. Due to Compass and Experian's failure to investigate, they each further
26 failed to correct and update Plaintiff's information as required by 15 U.S.C.
27
28

§ 1681s-2(b)(1)(E), thereby causing continued reporting of inaccurate information in violation of 15 U.S.C. § 1681-s(2)(b)(1)(C).

75. Plaintiff's continued efforts to correct Compass and Experian's erroneous and negative reporting of the Debt by communicating Plaintiff's dispute with Compass and Experian were fruitless.

76. Compass and Experian's continued inaccurate and negative reporting of the Debt in light of its knowledge of the actual error was willful.

77. Compass and Experian's inaccurate and negative reporting damaged Plaintiff's creditworthiness.

78. By inaccurately reporting account information relating to the Debt after notice and confirmation of its errors, Compass and Experian failed to take the appropriate measures as determined in 15 U.S.C. §§ 1681-s(2)(b)(1)(D) and (E).

Mortgage Service Center Misreported Credit Information

Re: Account No. 954600621*

79. In an Experian credit report dated February 11, 2015, MSC reported the following inaccurate, derogatory information:

- Post-bankruptcy information for the following dates: August 2012—
May 2014 (180 days past due)
- Account Balances from February 2013 through May 2014 in the
Account History Section

1 80. MSC should not have reported derogatory information on Plaintiff's account
2 after April 30, 2010, because Plaintiff filed for Bankruptcy on April 30,
3 2010.

4
5 81. The adverse information reported by Defendant complained of herein was
6 based on Defendant's assertion of pre-bankruptcy obligations and was
7 therefore inaccurate, since after filing Chapter 13 Bankruptcy the Chapter 13
8 plan determined how Defendant would be paid. Failing to report consistent
9 with the terms of the Chapter 13 plan was therefore inaccurate.
10

11 82. Defendant failed to report consistent with the terms of the Plaintiff's Chapter
12 13 Plan and thereby furnished inaccurate information as set forth herein.
13

14 83. On or about March 18, 2015, Plaintiff disputed MSC's reported information
15 regarding the Debt pursuant to 15 U.S.C. § 1681I(a)(2) by notifying
16 Experian, in writing, of the incorrect and inaccurate credit information
17 furnished by MSC.
18

19 84. Specifically, Plaintiff sent a letter, certified, return receipt, to Experian (the
20 "Experian Dispute Letter"), requesting the above inaccurate and incorrect
21 derogatory information be removed as follows:
22

- 23
- 24 • This account was discharged in my Bankruptcy which was filed on
25 4/30/2010 and discharged 8/26/2014, bearing docket No. 10-17987 in
26 the District for Nevada. There should be no derogatory reporting after
27 the filing date. Specifically, please remove the derogatory information
28 for the following post-bankruptcy dates: Aug2012 – May2014 (180
days past due).

- This account was discharged in my Bankruptcy which was filed on 4/30/2010 and discharged 8/26/2014, bearing docket No. 10-17987 in the District for Nevada. The balance on this account should be "\$0" and the status should be reporting as "current". Specifically, in the Account history you show Account Balances from Feb13 – May14.

85. The Experian Dispute Letter further requested that Experian:

- Immediately delete this account and the disputed derogatory information from [Plaintiff's] credit report.
- The discharged debt should be reported with an account balance of \$0 with a status of "current".
- Further, there should be no post-bankruptcy activity reported on this account. The date of last activity on this account should pre-date my bankruptcy filing date, 4/30/2010, since a default on this account occurred no later than the Bankruptcy filing date.
- Any post-bankruptcy derogatory information should be immediately deleted from [Plaintiff's] report.
- If [Experian] do[es] not immediately delete this from [Plaintiff's] credit report, please include a 100-word statement in my credit report of all of the disputed information contained in this letter regarding this account.

86. Upon information and belief, Experian timely notified MSC of Plaintiff's dispute, but MSC continued reporting derogatory information.

87. MSC and Experian were required to conduct a reinvestigation into this specific account on Plaintiff's consumer report pursuant to 15 U.S.C. §1681i.

1 88. On or about April 13, 2015, Plaintiff received notification from Experian
2 that MSC and Experian received notice of Plaintiff's dispute pursuant to 15
3 U.S.C. § 1681i(a)(6), and verified the account "may be considered negative."
4

5 89. Surprisingly, rather than remove all the inaccurate, derogatory information
6 from Plaintiff's report, MSC and Experian simply left derogatory
7 information on Plaintiff's report. Specifically, MSC and Experian reported
8 the following inaccurate, derogatory information:
9

- 10 • Post-bankruptcy information for the following dates: August 2012—
11 May 2014 (180 days past due)
12
- 13 • Account Balances from April 2013 through May 2014 in the Account
14 History Section
15

16 90. MSC and Experian, upon receipt of Plaintiff's dispute, failed to conduct an
17 investigation with respect to the disputed information as required by 15
18 U.S.C. § 1681s-2(b)(1)(A).
19

20 91. MSC and Experian failed to review all relevant information provided by
21 Plaintiff in the dispute to Experian, as required by and in violation of 15
22 U.S.C. § 1681s-2(b)(1)(B).
23

24 92. Due to MSC and Experian's failure to investigate, they each further failed to
25 correct and update Plaintiff's information as required by 15 U.S.C. § 1681s-
26 2(b)(1)(E), thereby causing continued reporting of inaccurate information in
27 violation of 15 U.S.C. § 1681-s(2)(b)(1)(C).
28

1 93. Plaintiff's continued efforts to correct MSC and Experian's erroneous and
2 negative reporting of the Debt by communicating Plaintiff's dispute with
3 MSC and Experian were fruitless.

4
5 94. MSC and Experian's continued inaccurate and negative reporting of the
6 Debt in light of its knowledge of the actual error was willful.

7
8 95. MSC and Experian's inaccurate and negative reporting damaged Plaintiff's
9 creditworthiness.

10 96. By inaccurately reporting account information relating to the Debt after
11 notice and confirmation of its errors, MSC and Experian failed to take the
12 appropriate measures as determined in 15 U.S.C. §§ 1681-s(2)(b)(1)(D) and
13 (E).
14

15 **Mortgage Service Center Misreported Credit Information**

16
17 **Re: Account No. 954600795***

18 97. In an Experian credit report dated February 11, 2015, MSC reported the
19 following inaccurate, derogatory information:

- 20
21 • Post-bankruptcy information for the following dates: March 2014 and
22 June 2014 (30 days past due)
23
24 • Account Balances from February 2013 through August 2014 in the
25 Account History Section
26
27
28

1 98. MSC should not have reported derogatory information on Plaintiff's account
2 after April 30, 2010, because Plaintiff filed for Bankruptcy on April 30,
3 2010.

4
5 99. The adverse information reported by Defendant complained of herein was
6 based on Defendant's assertion of pre-bankruptcy obligations and was
7 therefore inaccurate, since after filing Chapter 13 Bankruptcy the Chapter 13
8 plan determined how Defendant would be paid. Failing to report consistent
9 with the terms of the Chapter 13 plan was therefore inaccurate.

10
11 100. Defendant failed to report consistent with the terms of the Plaintiff's Chapter
12 13 Plan and thereby furnished inaccurate information as set forth herein.

13
14 101. On or about March 18, 2015, Plaintiff disputed MSC's reported information
15 regarding the Debt pursuant to 15 U.S.C. § 1681I(a)(2) by notifying
16 Experian, in writing, of the incorrect and inaccurate credit information
17 furnished by MSC.

18
19 102. Specifically, Plaintiff sent a letter, certified, return receipt, to Experian (the
20 "Experian Dispute Letter"), requesting the above inaccurate and incorrect
21 derogatory information be removed as follows:

- 22
23
- 24 • This account was discharged in my Bankruptcy which was filed on
25 4/30/2010 and discharged 8/26/2014, bearing docket No. 10-17987 in
26 the District for Nevada. There should be no derogatory reporting after
27 the filing date. Specifically, please remove the derogatory information
28 for the following post-bankruptcy dates: Mar2014 and Jun2014 (30
days past due).

- This account was discharged in my Bankruptcy which was filed on 4/30/2010 and discharged 8/26/2014, bearing docket No. 10-17987 in the District for Nevada. The balance on this account should be "\$0" and the status should be reporting as "current". Specifically, in the Account history you show Account Balances from Feb13 – Aug14

103. The Experian Dispute Letter further requested that Experian:

- Immediately delete this account and the disputed derogatory information from [Plaintiff's] credit report.
- The discharged debt should be reported with an account balance of \$0 with a status of "current".
- Further, there should be no post-bankruptcy activity reported on this account. The date of last activity on this account should pre-date my bankruptcy filing date, 4/30/2010, since a default on this account occurred no later than the Bankruptcy filing date.
- Any post-bankruptcy derogatory information should be immediately deleted from [Plaintiff's] report.
- If [Experian] do[es] not immediately delete this from [Plaintiff's] credit report, please include a 100-word statement in my credit report of all of the disputed information contained in this letter regarding this account.

104. Upon information and belief, Experian timely notified MSC of Plaintiff's dispute, but MSC continued reporting derogatory information.

105. MSC and Experian were required to conduct a reinvestigation into this specific account on Plaintiff's consumer report pursuant to 15 U.S.C. §1681i.

1 106. On or about April 13, 2015, Plaintiff received notification from Experian
2 that MSC and Experian received notice of Plaintiff's dispute pursuant to 15
3 U.S.C. § 1681i(a)(6), and verified the account "may be considered negative."
4

5 107. Surprisingly, rather than remove all the inaccurate, derogatory information
6 from Plaintiff's report, MSC and Experian simply left derogatory
7 information on Plaintiff's report. Specifically, MSC and Experian reported
8 the following inaccurate, derogatory information:
9

- 10 • Post-bankruptcy information for the following dates: March 2014 and
11 June 2014 (30 days past due)
12
- 13 • Account Balances from April 2013 through August 2014 in the
14 Account History Section

15 108. MSC and Experian, upon receipt of Plaintiff's dispute, failed to conduct an
16 investigation with respect to the disputed information as required by 15
17 U.S.C. § 1681s-2(b)(1)(A).
18

19 109. MSC and Experian failed to review all relevant information provided by
20 Plaintiff in the dispute to Experian, as required by and in violation of 15
21 U.S.C. § 1681s-2(b)(1)(B).
22

23 110. Due to MSC and Experian's failure to investigate, they each further failed to
24 correct and update Plaintiff's information as required by 15 U.S.C. § 1681s-
25 2(b)(1)(E), thereby causing continued reporting of inaccurate information in
26 violation of 15 U.S.C. § 1681-s(2)(b)(1)(C).
27
28

1 111. Plaintiff's continued efforts to correct MSC and Experian's erroneous and
2 negative reporting of the Debt by communicating Plaintiff's dispute with
3 MSC and Experian were fruitless.

4
5 112. MSC and Experian's continued inaccurate and negative reporting of the
6 Debt in light of its knowledge of the actual error was willful.

7
8 113. MSC and Experian's inaccurate and negative reporting damaged Plaintiff's
9 creditworthiness.

10 114. By inaccurately reporting account information relating to the Debt after
11 notice and confirmation of its errors, MSC and Experian failed to take the
12 appropriate measures as determined in 15 U.S.C. §§ 1681-s(2)(b)(1)(D) and
13 (E).
14

15 **Specialized Loan Servicing, LLC Misreported Credit Information**

16
17 **Re: Account No. 100876***

18 115. In an Experian credit report dated February 11, 2015, SLS reported the
19 following inaccurate, derogatory information:
20

- 21 • Account Balances from September 2014 through October 2014 in the
22 Account History Section

23 116. SLS should not have reported derogatory information on Plaintiff's account
24 after April 30, 2010, because Plaintiff filed for Bankruptcy on April 30,
25 2010.
26
27
28

1 117. The adverse information reported by Defendant complained of herein was
2 based on Defendant's assertion of pre-bankruptcy obligations and was
3 therefore inaccurate, since after filing Chapter 13 Bankruptcy the Chapter 13
4 plan determined how Defendant would be paid. Failing to report consistent
5 with the terms of the Chapter 13 plan was therefore inaccurate.
6

7 118. Defendant failed to report consistent with the terms of the Plaintiff's Chapter
8 13 Plan and thereby furnished inaccurate information as set forth herein.
9

10 119. On or about March 18, 2015, Plaintiff disputed SLS's reported information
11 regarding the Debt pursuant to 15 U.S.C. § 1681I(a)(2) by notifying
12 Experian, in writing, of the incorrect and inaccurate credit information
13 furnished by SLS.
14

15 120. Specifically, Plaintiff sent a letter, certified, return receipt, to Experian (the
16 "Experian Dispute Letter"), requesting the above inaccurate and incorrect
17 derogatory information be removed as follows:
18

- 19
- 20 • This account was discharged in my Bankruptcy which was filed on
21 4/30/2010 and discharged 8/26/2014, bearing docket No. 10-17987 in
22 the District for Nevada. The balance on this account should be "\$0"
23 and the status should be reporting as "current". Specifically, you show
24 in the Account history Account Balances from Sep14 – Oct14.

25 121. The Experian Dispute Letter further requested that Experian:

- 26
- 27 • Immediately delete this account and the disputed derogatory
28 information from [Plaintiff's] credit report.
 - The discharged debt should be reported with an account balance
of \$0 with a status of "current".

1 • Further, there should be no post-bankruptcy activity reported on
2 this account. The date of last activity on this account should pre-
3 date my bankruptcy filing date, 4/30/2010, since a default on this
4 account occurred no later than the Bankruptcy filing date.

5 • Any post-bankruptcy derogatory information should be
6 immediately deleted from [Plaintiff's] report.

7 • If [Experian] do[es] not immediately delete this from
8 [Plaintiff's] credit report, please include a 100-word statement in
9 my credit report of all of the disputed information contained in this
letter regarding this account.

10 122. Upon information and belief, Experian timely notified SLS of Plaintiff's
11 dispute, but SLS continued reporting derogatory information.
12

13 123. SLS and Experian were required to conduct a reinvestigation into this
14 specific account on Plaintiff's consumer report pursuant to 15 U.S.C.
15 §1681i.
16

17 124. On or about April 13, 2015, Plaintiff received notification from Experian
18 that SLS and Experian received notice of Plaintiff's dispute pursuant to 15
19 U.S.C. § 1681i(a)(6), and verified the account "may be considered negative."
20

21 125. Surprisingly, rather than remove all the inaccurate, derogatory information
22 from Plaintiff's report, SLS and Experian simply left derogatory information
23 on Plaintiff's report. Specifically, SLS and Experian reported the following
24 inaccurate, derogatory information:
25

- 26 • Account Balances from September 2014 through October 2014 in the
27 Account History Section
28

1 126. SLS and Experian, upon receipt of Plaintiff's dispute, failed to conduct an
2 investigation with respect to the disputed information as required by 15
3 U.S.C. § 1681s-2(b)(1)(A).
4

5 127. SLS and Experian failed to review all relevant information provided by
6 Plaintiff in the dispute to Experian, as required by and in violation of 15
7 U.S.C. § 1681s-2(b)(1)(B).
8

9 128. Due to SLS and Experian's failure to investigate, they each further failed to
10 correct and update Plaintiff's information as required by 15 U.S.C. § 1681s-
11 2(b)(1)(E), thereby causing continued reporting of inaccurate information in
12 violation of 15 U.S.C. § 1681-s(2)(b)(1)(C).
13

14 129. Plaintiff's continued efforts to correct SLS and Experian's erroneous and
15 negative reporting of the Debt by communicating Plaintiff's dispute with
16 SLS and Experian were fruitless.
17

18 130. SLS and Experian's continued inaccurate and negative reporting of the Debt
19 in light of its knowledge of the actual error was willful.
20

21 131. SLS and Experian's inaccurate and negative reporting damaged Plaintiff's
22 creditworthiness.
23

24 132. By inaccurately reporting account information relating to the Debt after
25 notice and confirmation of its errors, SLS and Experian failed to take the
26 appropriate measures as determined in 15 U.S.C. §§ 1681-s(2)(b)(1)(D) and
27 (E).
28

Roundpoint Mortgage Misreported Credit Information

Re: Account No. 596200109*

133. In an Experian credit report dated February 11, 2015, Roundpoint reported the following inaccurate, derogatory information:

- Recent Balance of \$378,100 as of February 2015
- Account Balances from November 2014 through December 2014 in the Account History Section

134. Roundpoint should not have reported derogatory information on Plaintiff's account after April 30, 2010, because Plaintiff filed for Bankruptcy on April 30, 2010.

135. The adverse information reported by Defendant complained of herein was based on Defendant's assertion of pre-bankruptcy obligations and was therefore inaccurate, since after filing Chapter 13 Bankruptcy the Chapter 13 plan determined how Defendant would be paid. Failing to report consistent with the terms of the Chapter 13 plan was therefore inaccurate.

136. Defendant failed to report consistent with the terms of the Plaintiff's Chapter 13 Plan and thereby furnished inaccurate information as set forth herein.

137. On or about March 18, 2015, Plaintiff disputed Roundpoint's reported information regarding the Debt pursuant to 15 U.S.C. § 1681I(a)(2) by notifying Experian, in writing, of the incorrect and inaccurate credit information furnished by Roundpoint.

1 138. Specifically, Plaintiff sent a letter, certified, return receipt, to Experian (the
2 “Experian Dispute Letter”), requesting the above inaccurate and incorrect
3 derogatory information be removed as follows:
4

- 5 • This account was discharged in my Bankruptcy which was filed on
6 4/30/2010 and discharged 8/26/2014, bearing docket No. 10-17987 in
7 the District for Nevada. The balance on this account should be “\$0”
8 and the status should be reporting as “current”. Specifically, you show
9 a Recent balance of \$378,100 as of Feb 2015. Also, you show in the
10 Account history Account Balances from Nov14 – Dec14.

11 139. The Experian Dispute Letter further requested that Experian:
12

- 13 • Immediately delete this account and the disputed derogatory
14 information from [Plaintiff’s] credit report.
- 15 • The discharged debt should be reported with an account balance
16 of \$0 with a status of “current”.
- 17 • Further, there should be no post-bankruptcy activity reported on
18 this account. The date of last activity on this account should pre-
19 date my bankruptcy filing date, 4/30/2010, since a default on this
20 account occurred no later than the Bankruptcy filing date.
- 21 • Any post-bankruptcy derogatory information should be
22 immediately deleted from [Plaintiff’s] report.
- 23 • If [Experian] do[es] not immediately delete this from
24 [Plaintiff’s] credit report, please include a 100-word statement in
25 my credit report of all of the disputed information contained in this
26 letter regarding this account.

27 140. Upon information and belief, Experian timely notified Roundpoint of
28 Plaintiff’s dispute, but Roundpoint continued reporting derogatory
information.

1 141. Roundpoint and Experian were required to conduct a reinvestigation into
2 this specific account on Plaintiff's consumer report pursuant to 15 U.S.C.
3 §1681i.
4

5 142. On or about April 13, 2015, Plaintiff received notification from Experian
6 that Roundpoint and Experian received notice of Plaintiff's dispute pursuant
7 to 15 U.S.C. § 1681i(a)(6), and verified the account "may be considered
8 negative."
9

10 143. Surprisingly, rather than remove all the inaccurate, derogatory information
11 from Plaintiff's report, Roundpoint and Experian simply left derogatory
12 information on Plaintiff's report. Specifically, Roundpoint and Experian
13 reported the following inaccurate, derogatory information:
14

- 15 • Recent Balance of \$378,100 as of March 2015
- 16 • Account Balances from November 2014 through February 2015 in
17 the Account History Section
18

19 144. Roundpoint and Experian, upon receipt of Plaintiff's dispute, failed to
20 conduct an investigation with respect to the disputed information as required
21 by 15 U.S.C. § 1681s-2(b)(1)(A).
22

23 145. Roundpoint and Experian failed to review all relevant information provided
24 by Plaintiff in the dispute to Experian, as required by and in violation of 15
25 U.S.C. § 1681s-2(b)(1)(B).
26
27
28

1 146. Due to Roundpoint and Experian's failure to investigate, they each further
2 failed to correct and update Plaintiff's information as required by 15 U.S.C.
3 § 1681s-2(b)(1)(E), thereby causing continued reporting of inaccurate
4 information in violation of 15 U.S.C. § 1681-s(2)(b)(1)(C).
5

6 147. Plaintiff's continued efforts to correct Roundpoint and Experian's erroneous
7 and negative reporting of the Debt by communicating Plaintiff's dispute
8 with Roundpoint and Experian were fruitless.
9

10 148. Roundpoint and Experian's continued inaccurate and negative reporting of
11 the Debt in light of its knowledge of the actual error was willful.
12

13 149. Roundpoint and Experian's inaccurate and negative reporting damaged
14 Plaintiff's creditworthiness.
15

16 150. By inaccurately reporting account information relating to the Debt after
17 notice and confirmation of its errors, Roundpoint and Experian failed to take
18 the appropriate measures as determined in 15 U.S.C. §§ 1681-s(2)(b)(1)(D)
19 and (E).
20

21 **FIRST CAUSE OF ACTION**
22 **VIOLATION OF THE FAIR CREDIT REPORTING ACT**
23 **15 U.S.C. § 1681 *ET SEQ.* (FCRA)**

24 151. Plaintiff incorporates by reference all of the above paragraphs of this
25 Complaint as though fully stated herein.

26 152. The foregoing acts and omissions constitute numerous and multiple willful,
27 reckless or negligent violations of the FCRA, including but not limited to
28

each and every one of the above-cited provisions of the FCRA, 15 U.S.C. § 1681.

153. As a result of each and every willful violation of the FCRA, Plaintiff is entitled to actual damages as the Court may allow pursuant to 15 U.S.C. § 1681n(a)(1); statutory damages pursuant to 15 U.S.C. § 1681n(a)(1); punitive damages as the Court may allow pursuant to 15 U.S.C. § 1681n(a)(2); and reasonable attorney's fees and costs pursuant to 15 U.S.C. § 1681n(a)(3) from Defendants.

154. As a result of each and every negligent noncompliance of the FCRA, Plaintiff is entitled to actual damages as the Court may allow pursuant to 15 U.S.C. § 1681o(a)(1); and reasonable attorney's fees and costs pursuant to 15 U.S.C. § 1681o(a)(2) from Defendants.

PRAYER FOR RELIEF

Plaintiff respectfully requests the Court grant Plaintiff the following relief against Defendants:

FIRST CAUSE OF ACTION VIOLATION OF THE FAIR CREDIT REPORTING ACT 15 U.S.C. § 1681 ET SEQ. (FCRA)

- an award of actual damages pursuant to 15 U.S.C. § 1681n(a)(1);
- award of statutory damages pursuant to 15 U.S.C. § 1681n(a)(1);
- an award of punitive damages as the Court may allow pursuant to 15 U.S.C. § 1681n(a)(2);

- award of costs of litigation and reasonable attorney's fees, pursuant to 15 U.S.C. § 1681n(a)(3), and 15 U.S.C. § 1681(o)(a)(1) against Defendants for each incident of negligent noncompliance of the FCRA; and
- any other relief the Court may deem just and proper.

TRIAL BY JURY

155. Pursuant to the seventh amendment to the Constitution of the United States of America, Plaintiff is entitled to, and demands, a trial by jury.

Dated: August 6, 2015

Respectfully submitted,

BY: /s/ DANNY J. HOREN
DANNY J. HOREN, ESQ.
ATTORNEY FOR PLAINTIFF

1 **IAFD**

2 **KAZEROUNI LAW GROUP, APC**

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6 Las Vegas, NV 89117

7 Telephone: (800)400-6808

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9 Attorneys for Plaintiff

10 **DISTRICT COURT**
11 **CLARK COUNTY, NEVADA**

12 **BRIAN A. WALSH,**

13 **Plaintiff,**

14 **v.**

15 **BANK OF AMERICA, N.A.,**
16 **CAPITAL ONE, COMPASS BANK,**
17 **MORTGAGE SERVICE CENTER,**
18 **SPECIALIZED LOAN**
19 **SERVICING, LLC, ROUNDPOINT**
20 **MORTGAGE, and EXPERIAN**
21 **INFORMATION SOLUTIONS,**
22 **INC.**

23 **Defendants.**

24 **CASE NO.**

25 **DEPT. NO.**

26 **INITIAL APPEARANCE FEE DISCLOSURE (NRS CHAPTER 19)**

27 Pursuant to NRS Chapter 19, as amended by Senate Bill 106, filing fees are
28 submitted for parties appearing in the above entitled action as indicated below:

29 **1st Appearance Fee**

30 ☒ \$270.00

31 **Total Paid \$ 270.00**

32 **DATED: August 6, 2015**

33 **By: /s/ Danny J. Horen**

34 **Danny Horen, Esq.**

35 **Attorney for Plaintiff**